

BEYS LISTON & MOBARGHA LLP
Michael P. Beys

November 10, 2016

VIA ECF & FACSIMILE (212-805-7986)

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, No. S7 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We are counsel to defendant Kaleil Isaza Tuzman, who is currently on home detention living at the apartment of his friend Martin Feinberg at 515 East 79th Street, New York, NY. We respectfully submit this letter to request that Mr. Isaza Tuzman, on consent of both the government and Pretrial Services, be permitted to spend up to four nights each week at his home at 59 Hazelnis Drive, Loch Sheldrake, New York. On the remaining nights of the week, he would continue to stay at Mr. Feinberg's apartment. Both locations are within the Southern District of New York, and Mr. Isaza Tuzman would continue to be supervised by Officer John Moscato of Pretrial Services. This arrangement would allow for Mr. Isaza Tuzman to continue to meet with his lawyers and mental health care providers in New York City, while lowering the costs associated with living in Manhattan and reducing the burden on Mr. Feinberg.

I have communicated with Assistant U.S. Attorneys Damian Williams and Andrea Griswold, and the government consents to this application. I have also spoken with Pretrial Services Officer John Moscato, and he consents as well.

We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)